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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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MAY 25 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: PP#OF2413/FAP#OH5275: Thiodicarb in Soybeans and
Cottonseed. Amendment of 2/25/82.

From: Alfred Smith, Chemist *AS*
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Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief *CT*
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To: Jay. S. Ellenberger (PM# 12), I/RB
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and

Toxicology Branch
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The Union Carbide Company proposes tolerances for combined residues of Thiodicarb, dimethyl N,N'-[thiobis[(methylimino)carbonyloxy]] bis[ethanimidothioate], and its metabolite methomyl, N-[(methyl-carbamoyl)oxy]thioacetimidate, in or on cottonseed at 0.4 ppm, soybeans at 0.1 ppm, soybean straw at 0.2 ppm, cottonseed hulls at 0.8 ppm (FAT), and soybean hulls at 0.4 ppm (FAT).

The amendment is in response to our memo of 1/21/81 (A. Smith) in which questions were raised on the data.

The cotton labeling has been revised to reflect a single 28-day preharvest interval, and the feeding restriction on soybean forage has been expanded to include the feed use of hay. Additionally, the inert ingredients of the formulations have been identified and are cleared for use §180.1001 or §172.884 and §178.3620(b).

The foregoing submissions resolve questions raised in our memo of 1/21/81.

A method trial by EPA with Thiodicarb and its metabolite in soybeans is being requested to determine if the analytical method is adequate for enforcement purposes

Recommendation

TOX and EFB considerations permitting, we recommend for the proposed tolerances. This recommendation is contingent upon the results of the method trial.

If and when the proposed tolerances are established, thiodicarb should be added to the list of cholinesterase inhibitors in 40 CFR 180.3 (e)(5).

Because the metabolite of thiodicarb, methomyl, is a pesticide chemical in its own right with established tolerances, a subsection should be added to 40 CFR 180.3 (d): "Tolerances for related pesticide chemicals" (See e.g. Sec. 180.3 (d)(8)).

TS:769:RCB:ASmith:vg:CM#2:RM810:X77377:5/19/82
cc:RF, Circ., Smith, Thompson, FDA, TOX, EFB, EEB, PP#OF2413/FAP#OH5275
RDI: Quick, 5/17/82; Schmitt, 5/17/82

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